



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 06 2019

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7014 2870 0001 9577 6251
RETURN RECEIPT REQUESTED

Mr. Reginald Alston
Environmental Health and Safety Manager
Federal-Mogul Sealing Systems
7450 North McCormick Boulevard
Skokie, Illinois 60076-8103

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 005 119 334

Dear Mr. Alston:

On December 12, 2018 a representative of the U.S. Environmental Protection Agency inspected the Federal-Mogul facility located in Skokie, Illinois. As a "large quantity generator" of hazardous waste, Federal-Mogul is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Federal-Mogul's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste, universal waste and used oil. A copy of the inspection report is enclosed for your reference.

Based on information provided by Federal-Mogul, EPA's review of records pertaining to Federal-Mogul, and the inspectors' observations, EPA has determined that Federal-Mogul has stored hazardous waste without a permit or interim status as a result of Federal-Mogul's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 - § 722.134 (a)-(c). EPA has identified the permit exemption conditions with which Federal-Mogul was out of compliance at the time of the inspection in items numbered 1 and 2, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in items below are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725.

Accordingly, the failure of Federal-Mogul to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 (if the facility should have been permitted).

Finally, EPA has determined that Federal-Mogul violated the RCRA requirement related to hazardous waste exception reports, as described in paragraph 3, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATION OF TSD REQUIREMENTS

1. Management of Containers

A large quantity generator of hazardous waste must always close a container holding hazardous waste during storage, except when it is necessary to add or remove waste. *See* Ill. Admin. Code tit. 35 § 725.273(a).

At the time of the inspection, Federal-Mogul did not close a satellite accumulation container in the POS Oven Area, when hazardous waste was not being added or removed.

2. Inspections

At least weekly, a large quantity generator of hazardous waste must inspect areas where hazardous waste containers are stored and look for leaking containers and for deterioration of containers caused by corrosion or other factors. *See* Ill. Admin. Code tit. 35 § 725.274.

At the time of the inspection, Federal-Mogul could not demonstrate that it had, at least weekly, inspected areas where hazardous waste containers were stored and looked for leaking containers and for deterioration of containers caused by corrosion or other factors.

OTHER VIOLATION:

3. Exception Reporting

A large quantity generator of hazardous waste who does not receive a copy of the manifest with the hand written signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. Additionally, a large quantity generator of hazardous waste must submit an Exception Report if they have not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility 45 days of the date the waste was accepted by the initial transporter. *See* Ill. Admin. Code tit. 35 §§ 722.142(a)(1)-(2).

At the time of the inspection, Federal-Mogul had not contacted the transporter and/or the owner or operator of the designated facility for manifest number 004729558 within 35 days, nor submitted an exception report within 45 days.

It should also be noted that at the time of EPA's inspection, Federal-Mogul was not properly storing universal waste lamps, as described below.

4. Universal Waste Management

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed. *See* Ill. Admin. Code tit. 35 § 733.113(d)(1).

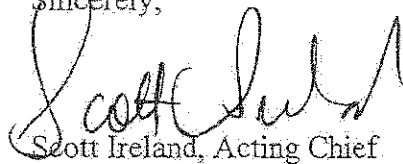
At the time of the inspection, Federal-Mogul had not closed three containers or packages of universal waste lamps.

Summary: By failing to comply with the conditions for a permit exemption, above, Federal-Mogul became an operator of a hazardous waste storage facility and was required to obtain an Illinois hazardous waste storage permit. Federal-Mogul failed to apply for such a permit. Federal-Mogul's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a). Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. During the inspection, as observed by EPA, and after the inspection, as documented in a December 18, 2018 email to EPA, Federal-Mogul took certain actions to establish compliance with the violations noted above. Based on the information received from Federal-Mogul on December 31, 2018, EPA is not planning any enforcement actions based on the inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Federal-Mogul's cooperation.

If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at 312-886-6199, or at sharrow.diane@epa.gov.

Sincerely,



Scott Ireland, Acting Chief
RCRA Branch

Enclosure

cc: Mr. Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Federal-Mogul Sealing Systems

EPA ID No.: ILD 005 119 534

LOCATION ADDRESS: 7450 North McCormick Boulevard, Skokie, Illinois 60076

NAICS CODE(S): 326299 All Other Rubber Product Manufacturing

DATE OF INSPECTION: 12 December 2018

EPA INSPECTOR: Diane M. Sharrow
Environmental Scientist / Senior Inspector
Mail Code LR-17J
Land and Chemicals Division
RCRA Branch
Compliance Section 1
(312) 886-6199 Direct
(312) 692-2906 Facsimile
Sharrow.diane@epa.gov

PREPARED BY:


Diane M. Sharrow
Environmental Scientist / Senior Inspector

12 December 2018
Date

APPROVED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

12/20/18
Date

INTRODUCTION

Purpose of Inspection

The purpose of the inspection was to conduct an unannounced Compliance Evaluation Inspection (CEI) at Federal-Mogul Systems (Federal-Mogul), located at 77450 North McCormick Boulevard, Skokie, Illinois. The CEI was conducted to evaluate Federal-Mogul's compliance with provisions of the Resource Conservation and Recovery Act (RCRA), and the state and federal regulations related to the generation, treatment and storage of solid waste, hazardous waste, used oil and universal waste.

Background

A CEI to evaluate compliance with certain provisions of the RCRA, including those regulations related to the generation, treatment and storage of hazardous waste, was last conducted at Federal-Mogul by staff of the Illinois Environmental Protection Agency (Illinois EPA) on January 15, 2015. Federal-Mogul manufactures and sells motor vehicle sealing system parts (e.g. gaskets). Federal-Mogul notified the United States Environmental Protection Agency (EPA) that it was a large quantity generator (LQG) of hazardous waste on or about August 18, 1980. The facility is operating as a LQG and most recently identified generated waste codes on their 2017 Annual Report as D001, D018, D039, D040, D035, F003 and F005.

OPENING CONFERENCE

I arrived at Federal-Mogul at approximately 8:45 A.M. CST. I parked my vehicle in visitor parking and walked to entrance located at 7450 North McCormick Boulevard (see Photographs 1, 2 and 3). I entered the vestibule and found that the inner doors were locked. I called the Security Office number on the telephone located in the vestibule. I identified myself to the gentleman who answered the telephone and explained that the purpose of my visit was to conduct an unannounced hazardous waste compliance evaluation inspection (CEI) at the facility. He asked for my mobile telephone number and said he would call me back. A few minutes later he called me on my mobile telephone and said that a representative from Environmental Health and Safety would meet me. Approximately ten minutes later, I was met by Monica Mercader, Environmental Health and Safety (EHS) Specialist and Yvette Borrego, Interim Health and Safety Manager. I presented my enforcement credentials to both women and explained that the purpose of my visit was to conduct an unannounced hazardous waste CEI at the facility. Ms. Mercader and Ms. Borrego escorted me into the building and to an office/room.

I explained to both women that the CEI had two portions; a review of records (Records Review) and a visual site inspection (VSI). I summarized the records that I would like to review and provided Ms. Borrego with the U.S. EPA OECA Small Business Information Sheet and the Region 5 Pollution Prevention Information Sheet. I informed them both that Federal-Mogul could claim any information gathered during the CEI as Confidential Business Information (CBI)

including: verbal information, documents and photographs. I asked them to verify that my personal safety equipment (steel-toed boots, hardhat, earplugs, and safety glasses with side shields) was adequate to conduct the VSI portion of the CEI. They indicated that my safety equipment was adequate. I also asked them if they could provide me with a copy of a site diagram that I could use during the VSI. Ms. Borrego provided a copy of the "Federal-Mogul Skokie Plant 1st Floor Base Plan," and identified where universal and hazardous waste was stored, and the hazardous waste satellite accumulation areas.

RECORDS REVIEW

I conducted the review of records in the Federal-Mogul office/room. During the Records Review I reviewed the 2017 hazardous waste annual report, hazardous waste manifests, land disposal restriction notifications (LDRs), and some inspection records. Ms. Borrego stated that analytical profiles completed by Safety-Kleen every three years were available. I noted that Federal-Mogul did not have a copy of Manifest No. 004729558 with the TSD signature. Ms. Borrego and Ms. Mercader said they would locate a copy or call Safety-Kleen and obtain a copy.

I reviewed the training records for personnel with hazardous waste job responsibilities including the following: Devlon Kimbrough and Kirk Rowland who work with hazardous waste and universal waste managed and stored at Building 6 / Dock 3; and EHS employees Tim Heidorn, Yvette Borrego, Monica Mercader and LaShonda Hoskim. In addition, I reviewed Federal-Mogul's Emergency Response Plan dated April 5, 2018, Spill Prevention Control and Countermeasure Plan (Contingency Plan) and associated records.

I reviewed the Satellite Waste Station Guidelines and written inspection records for the Satellite Accumulation Areas (SAA), but the written records for the hazardous waste storage area were not complete. Ms. Borrego and Ms. Mercader indicated that there may be more written inspection records at the hazardous and universal waste storage areas. I indicated that Illinois requires weekly inspections but does not require or specify how the records of inspection should be kept.

VISUAL SITE INSPECTION

At the end of the Record Review, I asked if I could complete the VSI. Ms. Borrego and Ms. Mercader agreed to escort me, but Ms. Borrego explained she would have to leave during the VSI to attend a meeting. We started the VSI by proceeding northwest to the Entrance 2 and the Security Desk, where I signed in and obtained a Visitor Pass.

We then continued to the northwest corner of the facility near Dock 3 the SAA is located and where I was introduced to Mr. Kimbrough. I presented my enforcement credentials to Mr. Kimbrough and explained that the purpose of my visit was to conduct an unannounced hazardous waste CEI at the facility.

In the universal waste storage area, I noted that there were batteries stored on a wood pallet (see Photograph 4). I cautioned Federal-Mogul representatives about several of the containers of non-lead acid batteries (AA, AAA, etc.) close to overflowing their containers, and reminded them that batteries that are damaged or leaking must be contained. I also noted and counted ten boxes of labeled waste lamps. All were "closed," but three were not completely contained by tape or other measures devices. I told the Federal-Mogul representatives that all waste lamp containers must be closed to contain potential breakage when not in use.

We then turned southeast and entered the Hazardous Waste Storage Area. I noted three closed 55-gallon containers stored along a wall under used oil storage area signage. The labels were turned in towards the wall but were labelled as: 1) used oil "PIGS," used oil "rags," and used oil.

I also noted two black 55-gallon containers outside the flammable storage unit (see Photographs 5, 7 and 8). I noted that the containers were labeled, but not dated as both were satellite accumulation containers. The container for mixed solvents held a closed funnel and the container for aerosol cans held a closed aerosol can puncturing unit.

Inside the flammable storage unit, I noted one black 55-gallon container that was closed and labeled as hazardous waste and marked as acetate. I also noted there were four 1-gallon containers, that Mr. Kimbrough indicated were adhesive products.

Along the south west wall by the overhead door on the right, I noted two black 55-gallon containers on either side of a red hand-cart (see Photograph 6). Both were closed but one was labeled as used oil, and the other was labeled as used oily water. I asked Mr. Kimbrough about the used oily water label and he indicated that it was non-hazardous and pumped out separately from the used oil container by Safety-Kleen.

I asked the Federal-Mogul staff about written weekly inspection checklists or reports. The May 2018 reports were located on clipboards on the exterior of the flammable storage unit to the right of the doors (see Photograph 5). Mr. Kimbrough left for a minute or two and came back with an envelope. He indicated that past reports were sent to Mr. Heidorn. Ms. Borrego and Ms. Mercader indicated that they would go through the envelope and speak with Mr. Heidorn and organize the reports by date and provide a summary to me. At this time Ms. Borrego left, and Ms. Mercader accompanied me back to the office for a restroom break.

Ms. Mercader then escorted me to the five SAAs as follows: 1) two cabinets in Area 17 with one 55 gallon container of mineral spirits and the other with one 55 gallon container of hazardous was naphtha primer; 2) air construction permit area under construction with three cabinets containing one product container; one hazardous waste solvent; and one nonhazardous water based waste; 3) one 55-gallon container of hazardous solvent in the 854 Oven Area; 4) one 55-gallon container of hazardous waste with an open funnel in the POS Oven Area; and one 55-gallon container in the Molding Group Dip Room. All the containers storing hazardous waste were labeled, but the container in the POS Oven Area had an open funnel. We then left the Molding Group Building and returned to the Federal-Mogul office.

During the VSI portion of the CEI, I took eight (8) photographs. These 8 photographs were taken with a Canon Power Shot A2500 digital camera, with 16-megapixel resolution. These 8 photographs are attached to this inspection report and are true and representative of the conditions I observed on the date of the CEI, except that the time on the photographs is EST and not CST DST.

CLOSING CONFERENCE

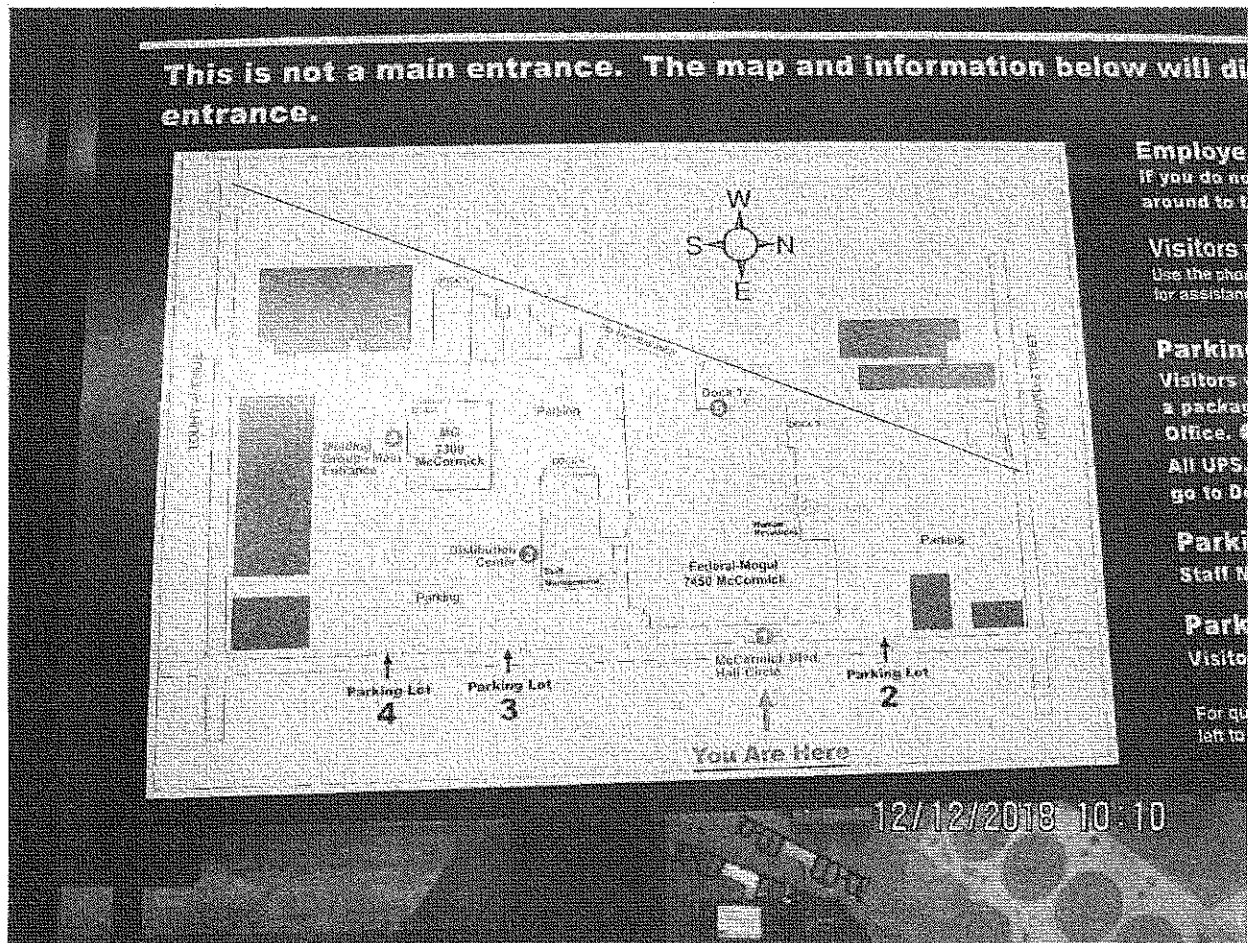
At the end of the CEI, I conducted a brief closing conference with Ms. Mercader. I explained that I would review my notes, checklist and photographs and make a compliance decision in consultation with my management. I also explained that EPA would send a letter to Federal-Mogul, along with the inspection report, checklist and photographs. I then concluded the CEI. Ms. Mercader then escorted me to the Entrance 2 Security Desk where I signed out and returned my visitor pass. I then returned to my vehicle and departed Federal-Mogul at approximately 12:45 P.M.

Attachment(s)

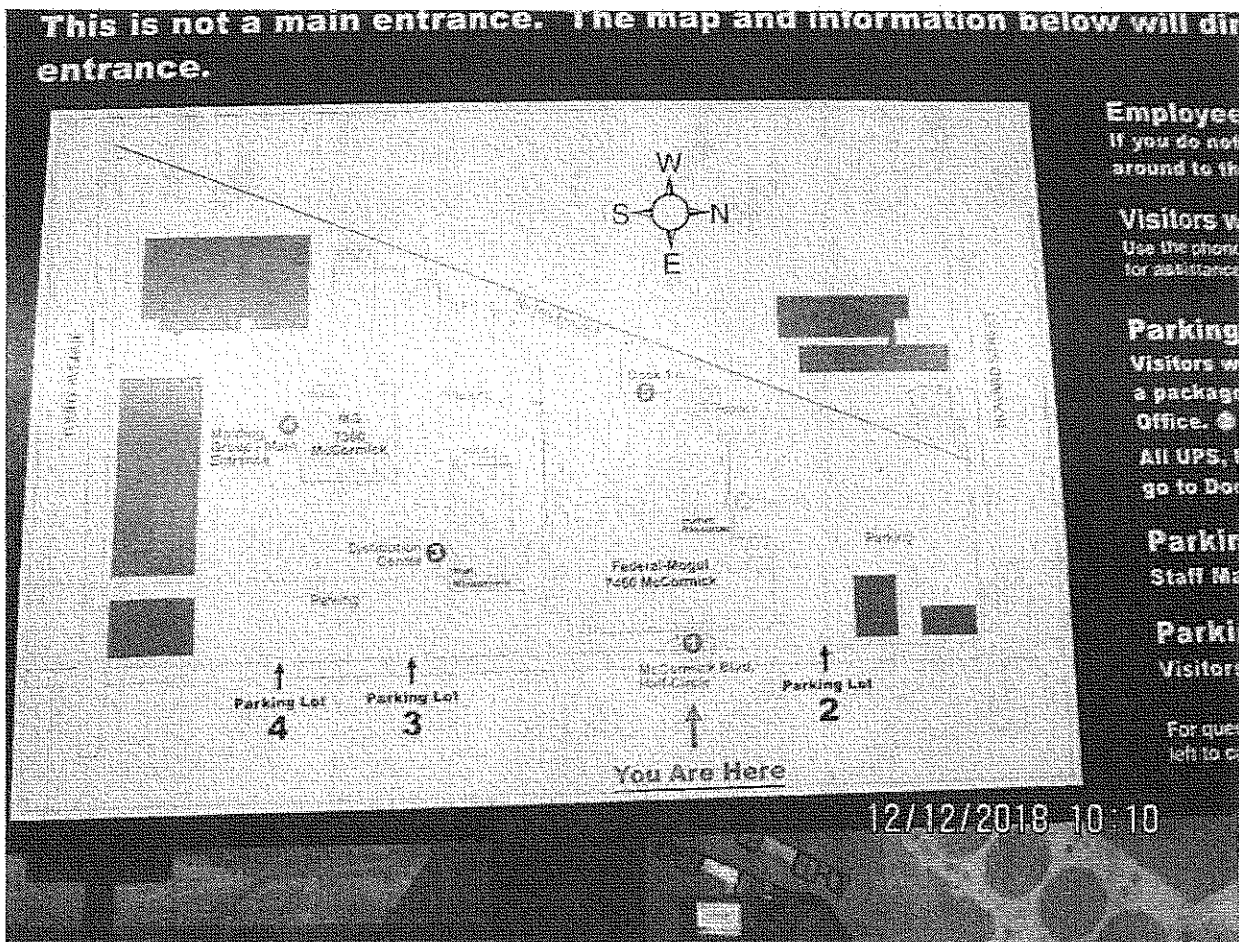
Inspection Checklist
Photographs (8)



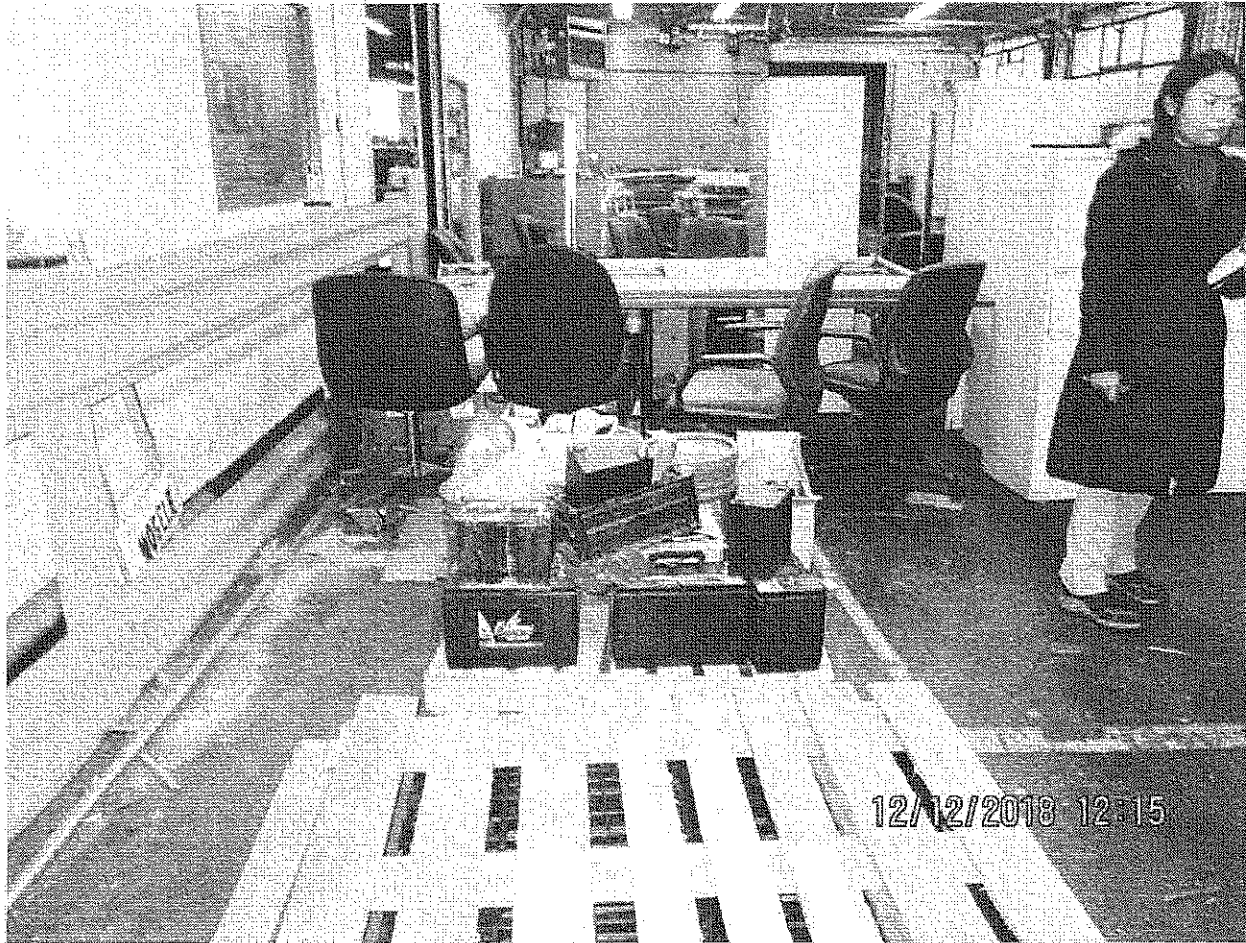
PHOTOGRAPH 1: Federal-Mogul Diagram at Entrance 1 on McCormick Boulevard



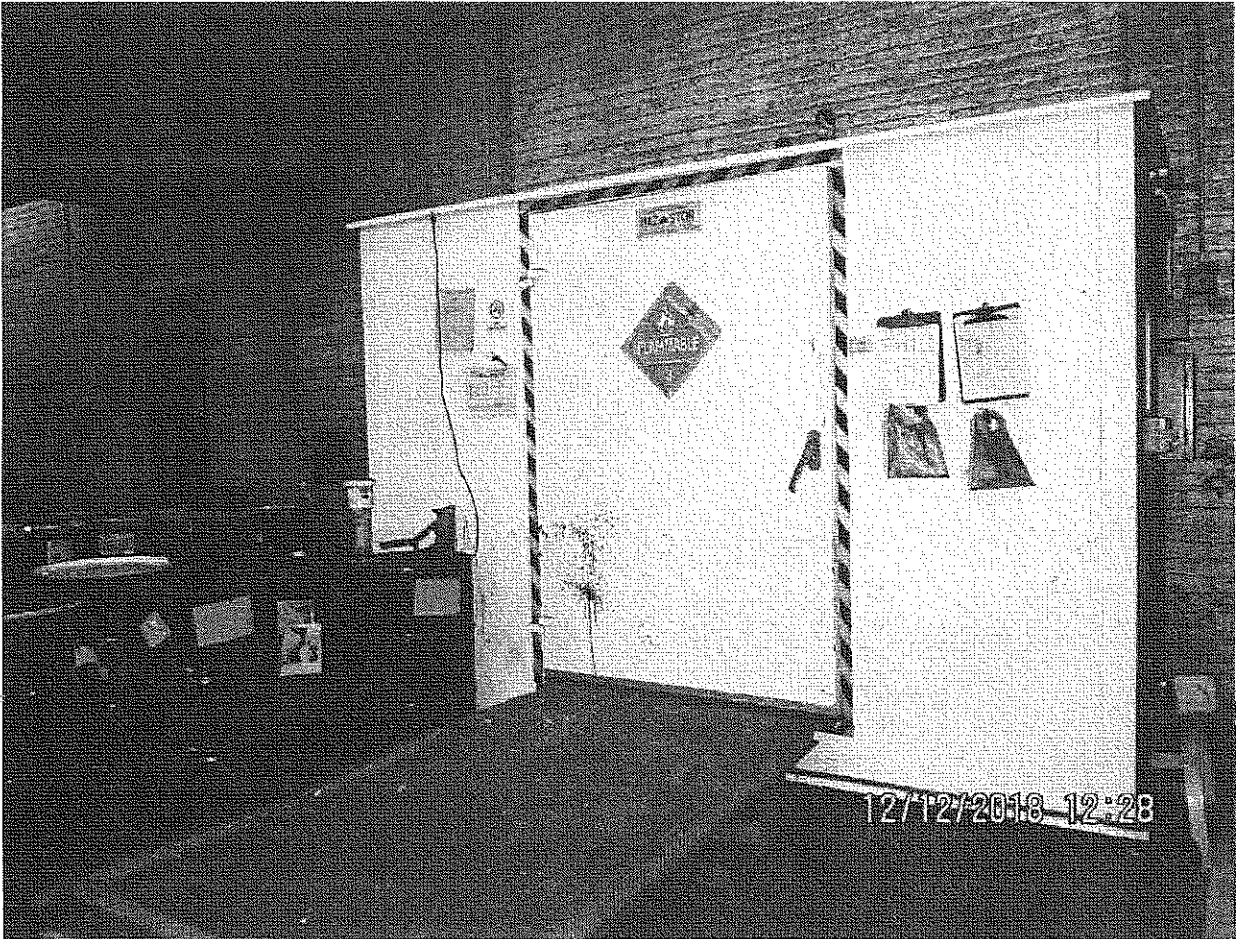
PHOTOGRAPH 2: Federal-Mogul Diagram at Entrance 1 on McCormick Boulevard



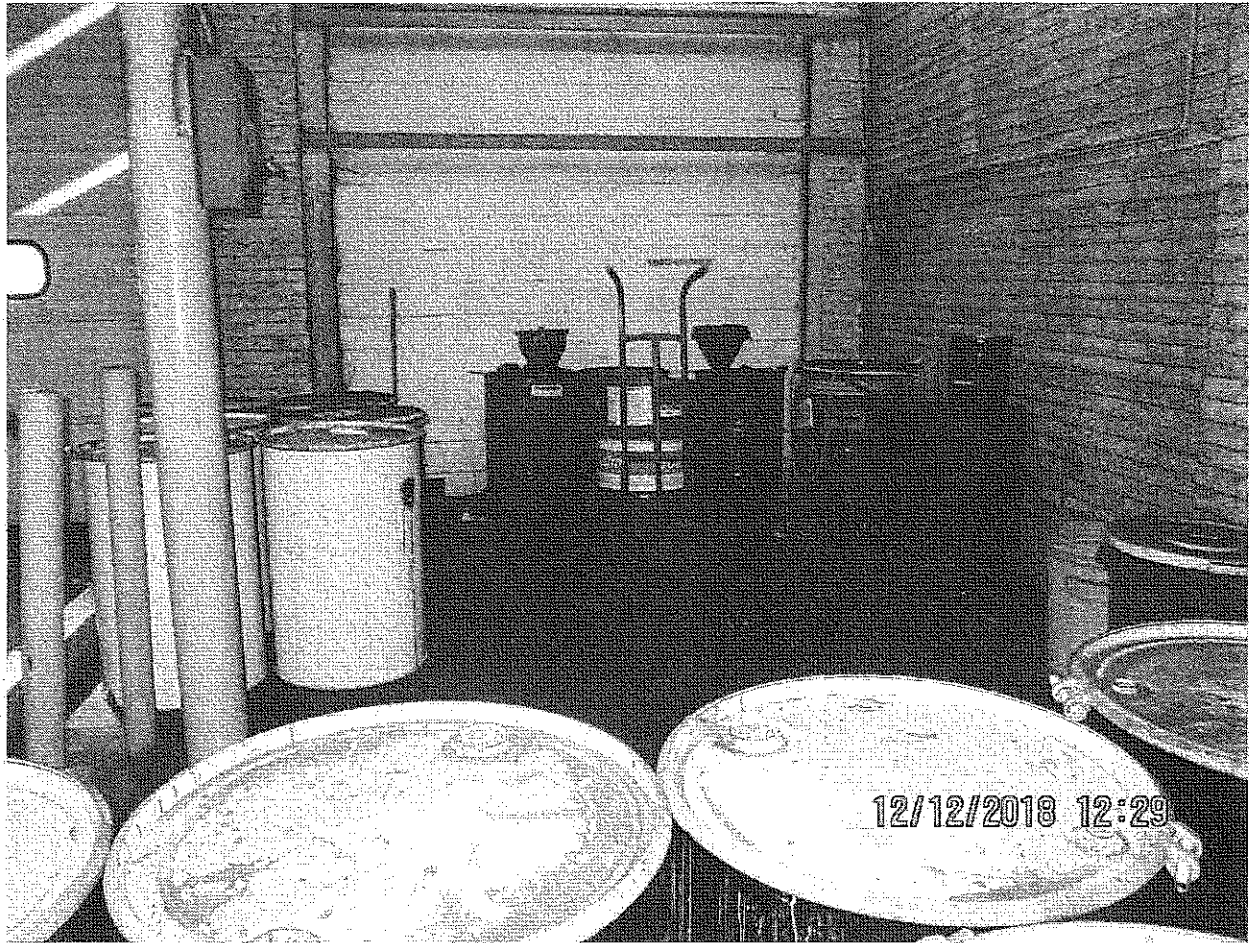
PHOTOGRAPH 3: Federal-Mogul Diagram at Entrance 1 on McCormick Boulevard



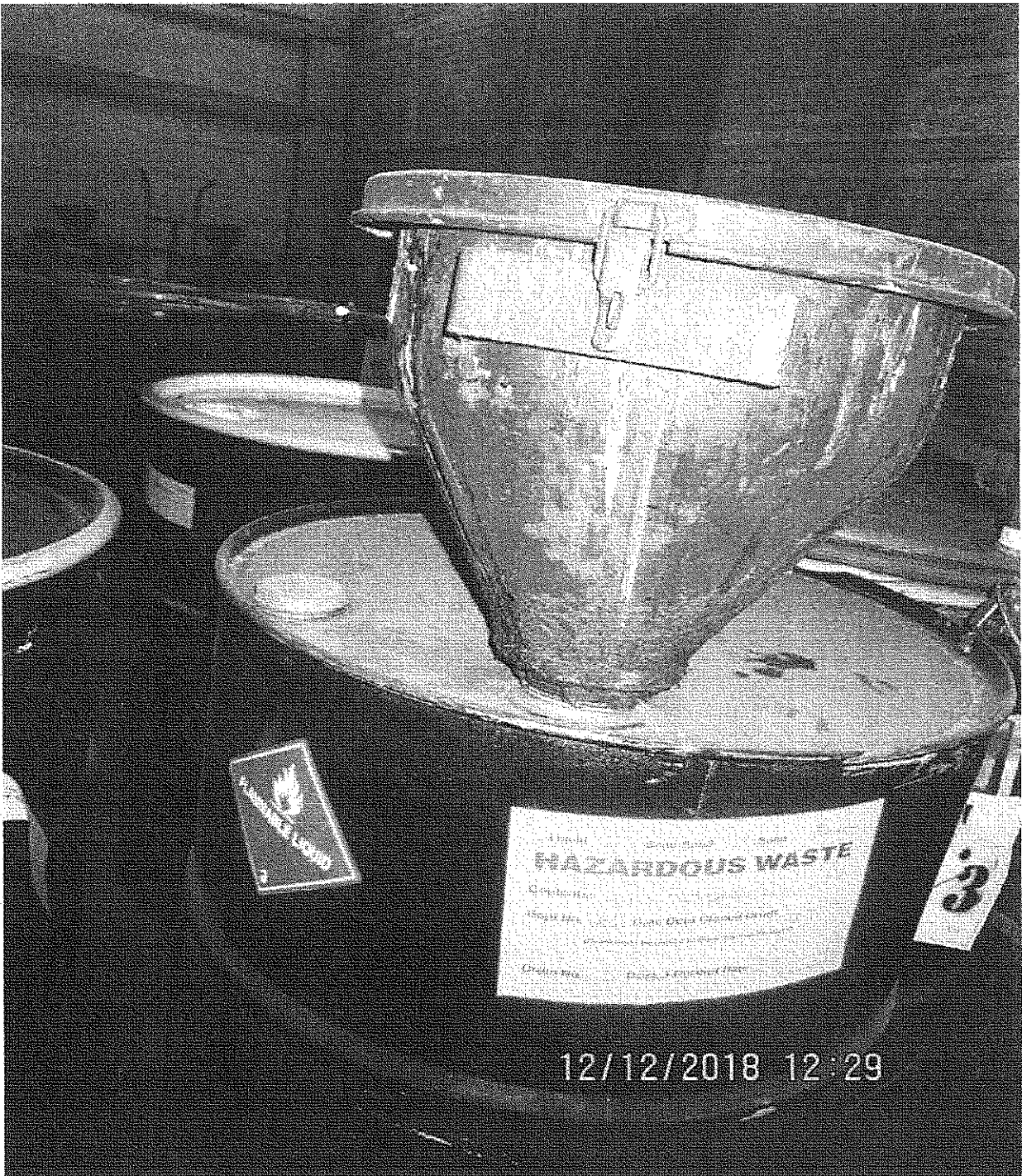
PHOTOGRAPH 4: Universal Waste Battery Storage



PHOTOGRAPH 5: Hazardous Waste Storage Area with two 55-gallon black satellite accumulation containers (one with funnel in lid on left and one with aerosol can puncturing device in lid on right) with orange hazardous waste labels and flammable storage unit with one 55-gallon container stored inside and weekly inspection clipboards posted on right of door.



PHOTOGRAPH 6: Hazardous Waste Storage Area with one 55-gallon black container and funnel of non-hazardous waste (used oily water) left of hand cart, and one 55-gallon black container and funnel of used oil right of hand cart.



PHOTOGRAPH 7: One 55-gallon black satellite accumulation container with funnel of "mix solvent" hazardous waste outside flammable storage unit.



PHOTOGRAPH 8: One 55-gallon black satellite accumulation container with funnel of "aerosol" hazardous waste outside flammable storage unit.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>Missing BOS signature</i>	722.120(b)
	Section 722.121 Acquisition of Manifests Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes _____ No <u>✓</u> N/A _____	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No <u>✓</u> N/A <u>✓</u>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No _____ N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, AB, and CC? Yes <u>✓</u> No _____ N/A _____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart I, AA, AB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <u>✓</u>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>✓</u>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>✓</u>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No _____ N/A _____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes _____ No _____ N/A _____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 725.107(a)(4)? Yes _____ No _____ N/A _____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <u>✓</u> No _____ N/A _____	
	If "No", go to Subpart I.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes _____ No <u>✓</u> N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>✓</u>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>✓</u>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <u>✓</u> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No <u>✓</u> N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards.</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	
	<p>Does the generator accumulate and/or treat hazardous waste in tanks?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p>	
	<p>SUBPART J: TANK SYSTEMS</p>	
(725.211)	<p>Has the generator closed an accumulation area?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

No HW Tanks DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

DMS

No H/W Tanks DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

DMS

No Hw Tanks DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(h))	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (b) and (c)? Yes _____ No _____ N/A _____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A _____ 2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A _____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A _____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A _____	7
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A _____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____ Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A _____ 2) overflow prevention controls? Yes _____ No _____ N/A _____ 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____	
(725.294(c))	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overflow/spill control equipment? Yes _____ No _____ N/A _____ 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A _____ 3) data from monitoring equipment? Yes _____ No _____ N/A _____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using, prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

No Hw Tanks DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

*No Hw Treatment
X
DMS*

DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<p>SUBPART C: PREPAREDNESS AND PREVENTION</p> <p><i>INTER. SPACE Waste Policy Plan Emergency Resp Plan</i></p> <p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.132)	<p>Is the facility equipped with the following, if necessary:</p> <p>a) an internal communication or alarm system(s)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) a telephone or other device to summon emergency assistance from local authorities?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) water at adequate volume and pressure for fire control?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<i>Contractor + facility check</i>
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	<i>ADT</i>
(725.135)	<p>Is the facility maintaining adequate aisle space?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<i>ADT</i>
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? - agreements designating the primary authority where more than one police or fire department might respond? - agreements with State emergency response teams, contractors and equipment suppliers? - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
	<p>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</p> <p><i>3 Plans</i></p>	
(725.151(a))	<p>Is the contingency plan available?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<i>Waste Policy MWRD Space Emergency Resp Plan</i>
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	<i>no Hony</i>
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	

DMS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? <ul style="list-style-type: none"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> d) information regarding emergency coordinators changes? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
	<p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? - key parameters for automatic waste feed cut-off systems? - communications or alarm systems? - response to fire or explosions? - response to groundwater contamination incidents? - shutdown of operations? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<p><i>Make sure new hires 2018 to be completed</i></p>
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? 4) records documenting that the training or job experience has been given to and completed by facility personnel? <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

2018

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(722.107(a)(3))	<p>Section 722.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Is the plan on-site?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
722.134(c)	<p>Section 722.134 Satellite Accumulation</p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____</p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____</p> <p><i>more waste areas</i></p>	
722.134(g)	<p>Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p> <p>SUBPART D: RECORDKEEPING AND REPORTING</p>	
722.140(a)	<p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years:</p> <p>- a copy of each signed manifest?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <p>- copies of test results, waste analyses or other determinations made in accordance with Section 722.111?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p>Section 722.141 Annual Reporting</p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.170
	COMMENTS: N/AICS 376299 All Other Rubber Product Manufacturing SIC 3869 Fabricated Rubber Products / Sealing	

